Case	5:23-cv-01921-JGB-SP	Document 15 #:39	Filed 11/13/2	Page 1 of 4 Page ID				
1 2 3 4 5 6 7 8 9	Rebecca L. Adams California State Bar No. 300736 radams@lynnllp.com LYNN PINKER HURST & SCHWEGMANN, LLP 2100 Ross Avenue, Suite 2700 Dallas, Texas 75201 (214) 981-3800 - Telephone (214) 981-3839 - Facsimile  Counsel for Defendant  UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA							
11		RIVERS	IDE COURT					
12	A CHINA ANH TA ICNY A	т	e					
13	ASHWANI JAISWA	<b>.L</b> ,	\$ C \$ (S \$ N \$ M \$ T	ase No. 5:23-cv-01921-JGB				
14	Plaintiff,		§ (S	SPx)				
15 16	vs.		§ N	OTICE OF AGREED				
17	DICKEY'S BARBEO	CUE	§ M 8 T	OTION O EXTEND TIME TO				
18	RESTAURANTS, IN			NSWER OR OTHERWISE				
19	Defendant.		§ R § P	ESPOND TO LAINTIFF'S COMPLAINT				
20			\$ A \$ R \$ P.					
21			8					
22	To the Honorable	e Court:						
23	Please take notic							
24	Please take notice that this matter will be ruled upon by submission to the							
25	Court and no formal hearing is requested to consider the Agreed Motion to Answer							
26	or Otherwise Respond to Plaintiff's Complaint by Defendant Dickey's Barbecue							
27	Restaurants, Inc., (the	Restaurants, Inc., (the "Motion"). As set forth further in the Motion, this motion						
28	restaurants, me., (the inition j. 115 set forth further in the motion, this motion							
	None and Assess 25		1					

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1	should be granted because it is agr	reed, causes no prejudice, and is not made for the				
2	purposes of delay.					
3   4	The Motion is based on this Notice, Memorandum, pleadings on file in this					
5	matter, and any other material which may properly come before the Court before					
6	or during any hearing on this Motion.					
7						
8	COMPLIANCE STATEMENT					
9	This Motion is made following the conference of counsel pursuant to L.R.					
10	7-3 which took place on November 13, 2023.					
11   12	Dated: November 13, 2023	LYNN PINKER HURST &				
13		SCHWEGMANN LLP				
14		By: /s/ Rebecca L. Adams				
15		Rebecca L. Adams California State Bar No. 300736				
16		radams@lynnllp.com				
17		2100 Ross Avenue, Suite 2700 Dallas, Texas 75201				
18		(214) 981-3800 - Telephone				
19		(214) 981-3839 – Facsimile				
20		Counsel for Defendant				
21		Dickey's Barbecue Restaurants, Inc.				
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26 27						
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## AGREED MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

Defendant Dickey's Barbecue Restaurants, Inc.'s ("Dickey's) respectfully moves for an agreed extension of time for Dickey's to Answer or otherwise respond to Plaintiff's Complaint. On August 23, 2019, Plaintiff filed the instant lawsuit against Dickey's. Plaintiffs served Dickey's on October 6, 2023, making Dickey's original deadline to Answer or otherwise respond to the Complaint October 27, 2023.

Plaintiff and Dickey's previously agreed to a 14-day extension of time for Dickey's to Answer or otherwise respond to the Complaint, which the Court granted on October 26, 2023. Dkt. 14. Plaintiff and Dickey's have further agreed to extend the time for Dickey's to Answer or otherwise respond to the Complaint until **December 1, 2023**. This extension is requested to allow the parties time to consider potential alternate avenues of litigating or resolving Plaintiff's claims outside of this without the use of additional judicial resources, and the extension is therefore made in good faith, for good cause, and not for dilatory purposes.

<sup>&</sup>lt;sup>1</sup> The 14-day extension ended on November 10, 2023; however, that date was the federal holiday of Veteran's Day. Therefore, the deadline for filing was Monday, November 13, 2023 by operation of Federal Rule of Civil Procedure 6(a)(1)(c).

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1	Dated: November 13, 2	023	LYNN PINKER	HURST &
2			SCHWEGMAN	
3			By: /s/ Rebecca I	L. Adams
4			Rebecca L. Adar	ns
5			California State l radams@lynnllp	
6			2100 Ross Avenu	
7			Dallas, Texas 75 (214) 981-3800 -	
8			(214) 981-3839 -	- Facsimile
9			Counsel for Defe	
10			Dickey's Barbec	ue Restaurants, Inc.
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